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Attorneys for
Gene Descalzi and Leonarda Rombaoa

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

PG&E CORPORATION,
and

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**DECLARATION OF GENE DESCALZI
IN SUPPORT OF MOTION PURSUANT
TO FED. R. BANKR. P. 9006(b)(1) TO
ENLARGE THE TIME FOR GENE
DESCALZI AND LEONARDA
ROMBAOA TO FILE PROOF OF
CLAIMS**

☒ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088-DM.

Date: May 12, 2020
Time: 10:00a.m.
Place: 450 Golden Gate Avenue, Ctrm 17
San Francisco, CA 94102

Objection Deadline: May 5, 2020

I, Gene Descalzi, declare as follows:

- 1 1. I am a creditor in this case and submit this declaration in support of the Motion Pursuant
2 to Fed. R. Bankr. P. 9006(b)(1) to Enlarge the Time for Gene Descalzi and Leonarda
3 Rombaoa to File Proof of Claims.
- 4 2. I have personal knowledge of the foregoing, and if called upon to testify as a witness, I
5 could and would competently testify to the facts set forth in this declaration.
- 6 3. I am a survivor of the devastating and destructive fire that occurred in and around Santa
7 Rosa in October of 2017, commonly referred to as the "Tubbs fire."
- 8 4. In October of 2017, my wife (Leonarda Rombaoa) and I (hereinafter collectively
9 referred to as, "we", "us," and "our") were vacationing in Santa Rosa, California.
- 10 5. On October 8, 2017 and October 9, 2017, we were lodging at the Hilton Sonoma Wine
11 Country Hotel.
- 12 6. In the early hours of October 9, 2017, we were awoken to smoke and flames engulfing
13 the nearby area and hotel.
- 14 7. We had split seconds to react to escape the fire.
- 15 8. We had insufficient time to save our personal property, some of which was of significant
16 monetary value. The personal property perished in the fire and we suffered economic
17 damages as a result.
- 18 9. We also suffered personal injuries, including but not limited to injuries from smoke
19 inhalation, and severe emotional distress, including but not limited to Post Traumatic
20 Stress Disorder, as a result of the fire.
- 21 10. In 2017, we retained James O'Callahan, Esq. of the Los Angeles-based law firm, Girardi
22 & Keese, to represent us in connection with the damages we incurred as a result of the
23 fire.
- 24 11. In 2017 and 2018, we were in communication with Mr. O' Callahan regarding our case.

1 12. In early 2019, we left messages for Mr. O' Callahan to call us, but did not hear back
2 from him. We had assumed that he was busy working on our case, as well as other cases,
3 and would contact us in the event of a significant development.

4 13. On previous occasions, Mr. O' Callahan and his staff responded to our inquiries by
5 telling us to wait patiently and that we would be notified in the event of a significant
6 development. We were mindful of Mr. O' Callahan's busy schedule.

7 14. In or around February 11, 2020, we learned for the first time that Mr. O' Callahan had
8 died unexpectedly on January 29, 2019.

9 15. On February 13, 2020, we consulted the legal services of the Law Offices of Arsen
10 Sarapinian, P.C. and signed a retainer agreement for Mr. Sarapinian to continue
11 representing us in connection with the Tubbs fire (related cases in the Superior Court of
12 California commonly referred to as the ("the North Bay Fires")) and this related
13 bankruptcy matter.

14 16. In or around that time, Mr. Sarapinian informed us that there were bankruptcy claim
15 deadlines of October 21, 2019 and December 31, 2019 for creditors (fire victims) to
16 submit claims in this matter. We previously had no knowledge of these deadlines as they
17 were not provided to us by our former attorney, this Court, Prime Clerk, or any other
18 third party.

19 17. In or around that time, Mr. Sarapinian confirmed that his office did not locate any record
20 of claims having been submitted on our behalves by our prior attorney.

21 18. Mr. Sarapinian's office (through claims administrator Brown Greer) assisted us in
22 preparing claims on our behalves, which were filed with Prime Clerk on February 26,
23 2020 (Claim Nos. 97038 and 97039). My wife's claim was amended due to a minor
24 name misspelling and filed on March 5, 2020 (Claim No. 97583). True and correct
25 copies of the three late claims are attached hereto as **Exhibit 1**.
26
27
28

19. We thereafter did not receive any notifications from Prime Clerk or Brown Greer of our claims being rejected or objected to.

20. In April of 2020, Mr. Sarapinian's office learned and informed us that Prime Clerk would not send to us the disclosures and voting materials in relation to the proposed \$13.5 billion settlement in this bankruptcy matter because they deemed our claims late and that we were not included in the "impaired class" for voting purposes.

21. I respectfully request that the Court grant this Motion and enlarge the time for my wife and I to file the two proofs of claims based on our excusable neglect in not knowing of the claim deadlines, as well as the excusable neglect of our former attorney, Mr. O'Callahan and his law firm, for not informing us of the claim deadlines.

22. As stated above, we received no notice of the claim deadlines prior to their passing and we had no notice of our former attorney's death.

23. Since then, my wife and I have made good faith efforts to rectify this situation by taking immediate actions.

24. If this Motion is denied, my wife and I will suffer severe prejudice and irreparable harm as we will be barred from recovering for the significant damages we incurred in the fire.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed on 4/14/2020 in Honolulu, Hawaii,

DocuSigned by:

Gene Descalzi
Gene Descalzi

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>DESCALZI, GENE</u> Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name: <u>DESCALZI, GENE</u> Attorney Name (if applicable): <u>Sarapinian, Arsen</u> Attorney Bar Number (if applicable): _____ Street Address: <u>9465 Wilshire Boulevard Suite 300</u> City: <u>Beverly Hills</u> State: <u>CA</u> Zip Code: <u>90212</u> Phone Number: <u>(213)538-2903</u> Email Address: <u>arsen@sarapinianlaw.com</u>	Where should payments to the creditor be sent? (if different) Name: _____ Attorney Name (if applicable): _____ Attorney Bar Number (if applicable): _____ Street Address: _____ City: _____ State: _____ Zip Code: _____ Phone Number: _____ Email Address: _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Who made the earlier filing? <u>No one else</u>	

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input type="checkbox"/> Camp Fire (2018) <input checked="" type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)	Location(s): 417 Aviation Blvd, Santa Rosa, CA 95403-1069
9. How were you and/or your family harmed? Check all that apply	<div><input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input checked="" type="checkbox"/> Occupant <input checked="" type="checkbox"/> Other (Please specify): <div>Plaintiff was occupying the property (Hilton Hotel) with his wife, Leondra Rambaoa, while on vacation. Plaintiff was rescued from the fire but lost valuable personal property. This included but is not limited to: laptop, four pairs of shoes, two suitcases, bottle of champagne, champagne glasses, designer clothes (dress shirts, casual shirts, jeans, pants, jacket, trousers, socks, shorts, and other clothing), jacket, medications, phone charger, and other property.</div></div> <div><input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) Name: _____ <input checked="" type="checkbox"/> Business Loss/Interruption <input checked="" type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input checked="" type="checkbox"/> Other (Please specify): post traumatic stress disorder (PTSD) and emotional distress</div>
10. What damages are you and/or your family claiming/seeking? Check all that apply	<div><input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____</div>
11. How much is the claim?	_____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/20/2020 (mm/dd/yyyy)

/s/Arsen Sarapinian

Signature

Name	<u>arsen</u>	<u>sarapinian</u>
	First name	Middle name Last name

Title	<u>attorney at law</u>
-------	------------------------

Company	<u>Law Offices of Arsen Sarapinian</u>
	Identify the corporate servicer as the company if the authorized agent is a servicer.

Address	<u>9465 Wilshire Blvd., Ste. 300</u>		
	Number	Street	
	<u>Beverly Hills</u>	<u>CA</u>	<u>90212</u>
	City	State	ZIP Code

Contact phone	<u>2135382903</u>	Email <u>arsen@sarapinianlaw.com</u>
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
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Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
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Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

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Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>ROMBAOA, LEONDRA</u> Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name: <u>ROMBAOA, LEONDRA</u> Attorney Name (if applicable): <u>Sarapinian, Arsen</u> Attorney Bar Number (if applicable): _____ Street Address: <u>9465 Wilshire Boulevard Suite 300</u> City: <u>Beverly Hills</u> State: <u>CA</u> Zip Code: <u>90212</u> Phone Number: <u>(213)538-2903</u> Email Address: <u>arsen@sarapinianlaw.com</u>	Where should payments to the creditor be sent? (if different) Name: _____ Attorney Name (if applicable): _____ Attorney Bar Number (if applicable): _____ Street Address: _____ City: _____ State: _____ Zip Code: _____ Phone Number: _____ Email Address: _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Who made the earlier filing? <u>No one else</u>	

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input type="checkbox"/> Camp Fire (2018) <input checked="" type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different?)	Location(s): 417 Aviation Blvd., santa rosa, CA 95403
9. How were you and/or your family harmed? Check all that apply	<div><input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input checked="" type="checkbox"/> Occupant <input checked="" type="checkbox"/> Other (Please specify): <div>Plaintiff was occupying the property (Hilton Hotel) with her husband, Gene Descalzi, while on vacation. Plaintiff was rescued from the fire but lost four suitcases with valuable personal property. This included but is not limited to: laptops, computer, bottles of wine, jewelry (watches, earrings, rings), designer clothes, designed shoes, silk scarfs, sweaters, jeans, shorts, make-up, hair and face products, and other property.</div></div> <div><input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) Name: _____ <input checked="" type="checkbox"/> Business Loss/Interruption <input checked="" type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input checked="" type="checkbox"/> Other (Please specify): post traumatic stress disorder, emotional distress</div>
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Check the appropriate box:

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☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/20/2020 (mm/dd/yyyy)

/s/Arsen Sarapinian

Signature

Name	<u>arsen</u>	<u>sarapinian</u>
	First name	Middle name Last name

Title	<u>attorney at law</u>
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☒ I am the creditor's attorney or authorized agent.

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I declare under penalty of perjury that the foregoing is true and correct.

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/s/Arsen Sarapinian

Signature

Name	<u>arsen</u>	<u>sarapinian</u>
	First name	Middle name Last name

Title	<u>attorney at law</u>
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